

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES
Plaintiff

v.

YORK COUNTY POLICE
DEPARTMENT, JAMES H. MORGAN,
RICHARD PEDDICORD, RAYMOND E. CRAUL,
GENE FELS, DET. KESSLER, CO. BAYLARK,
RANDY SNIPES, BRIAN WESTMORELAND,
and DETECTIVE GLOWCZESKI,
Defendants

CIVIL ACTION NO. 1:01-CV-1015

(Judge Kane)

RECEIVED
OCT 28 2003
OFFICE OF ATTORNEY GENERAL
LITIGATION SECTION

~~RECEIVED FOR DEPARTMENT OF JUSTICE~~

Plaintiff's request, pursuant to Fed.R.Civ.P. Rule 34, that Defendants, YORK COUNTY POLICE DEPT., ET AL., who have documents Plaintiff want to see, produce for inspection and copying the following documents:

1. Complete, accurate, and legible copies of all official records reflecting departmental disciplinary action against all Police Officers/Agents, who were in any way connected with the Investigation and prosecution in this case.

2. All rules, regulations and policy pertaining to "Standard Police Procedure" on search and seizure, arrest and police interdiction.

3. All written statements, originals or copies, identifiable as reports of statements by Agents, Police, Civilian witnesses, Manager and Employees at Mail Box Etc.

4. All pertinent transcription(s), communication reports, facimiles, memos, phone log(s), UPS receipts of the claimed delivered package, between California Officials and Pennsylvania officials, involved in this case.

5. All information, original or copies, of Application for Probable Cause, Affidavit in conjunction with Application for Search Warrant concerning



the seizure of said evidence at Mail Box Etc., including arrest warrant.

6. Any and all investigative information of record leading to the Seizure of all said evidence in this case.

7. Any and all receipts showing of record that said evidence was in fact a matter of mail material from California, to Pennsylvania. Also, names and titles of those responsible parties for the shipping of said evidence from one jurisdiction to another, and the Court Order; [copy, or original], permitting of such action.

8. All search and arrest warrants, to enter Plaintiff's mail boxes, at the Mail Box Etc, dated January 8, 2001, through December 31, 2001.

9. All Government vehicle involved in the surveillance at the Kingston Square Center, on Eastern Blvd., York County on January 9, 2001, including vehicle identification number, registration number and License number.

PLEASE TAKE NOTICE, that the above requested documents shall be produce for inspection and copying by Plaintiffs at SCI-Rockview, P.O. Box A, Bellefonte, PA. 16823-0820, prior to any dates set forth for Court Proceedings. Such documents shall be produced for inspection by Plaintiffs and shall be xeroxed or photocopied by Defendants or their agents or employees and furnished to Plaintiffs.

Date: October 26, 2003.

Respectfully Submitted,

Tyrone James

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820